

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§
Herman E. Hoffman	§ CASE NO. 16-32617
Debtor	§ Chapter 12

CHAPTER 12 TRUSTEE'S OBJECTION TO CONFIRMATION

David G. Peake, Chapter 12 Trustee, Objects to Confirmation of Debtor's Plan for the following reasons and upon the following grounds:

1. The Debtor's plan does not contain a feasibility analysis and as such, the Trustee cannot determine if the plan is feasible.
2. The Debtor's plan does not contain a payment schedule.
3. The Debtor's plan does not contain a proper liquidation analysis. Without proper values listed for all assets, The Trustee cannot determine whether the Plan complies with 11 U.S.C. §1225(a)(4).
4. The Debtor has not filed any monthly operating reports. The Debtor has not provided any financial information to the Trustee, and the Trustee cannot determine if the Debtor has any income to fund a plan.
5. Debtor's anticipated sources of revenue is vague and misleading.
6. The Debtor has not disclosed any income from his wife although the plan indicates that she will be contributing to the plan payments.
7. It appears that the Debtor's main plan is to sue people or companies to fund a plan.
8. The Plan as proposed does not comply with 11 U.S.C. §1225(a)(3).
9. The Plan as proposed does not comply with 11 U.S.C. §1225(a)(5). At least one secured creditor has objected to confirmation of the plan.

Wherefore, the Trustee requests the Court to deny confirmation of Debtor's plan, and to grant him such other and further relief to which he may be entitled.

Respectfully submitted,

David G. Peake, Chapter 12 Trustee

By: /s/ Richard W. Aurich, Jr. / TX Bar No. 00792339
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CERTIFICATE OF SERVICE

A copy of the above Objection to Confirmation was served on January 10, 2017, on all parties on the attached service list.

/s/ Richard W. Aurich, Jr.

Label Matrix for local noticing 0541-4 Case 16-32617 Southern District of Texas Houston Tue Jan 10 11:50:51 CST 2017	SCC Realty Company, LTD 1330 Blue Bell Houston, TX 77038-3012	Southern Bancorp Bank 601 Main Street Arkadelphia, AR 71923-6037
US Trustee Office of the U S Trustee 515 Rusk Ave Ste 3516 Houston, TX 77002-2604	4 United States Bankruptcy Court PO Box 61010 Houston, TX 77208-1010	Accelerated Genetics E10890 Penny Lane Baraboo, WI 53913-9408
Ayrshire Breeders's Association of Cana 4865 boul.LaurierOuest.StHyacinth Quebec, Canada J2S JV4	Bank of Galesville 16893 South Main Street Galesville, WI 54630-7704	COBA/Select Sires, Inc. 1224 Alton Darby Creek Road Columbus, OH 43228-9792
CenterPoint Energy P.O.Box 2628 Houston, TX 77252-2628	Centerville Steel Works LLC N15936 State Road 35 Tempealeau, WI 54661-7210	Cereal Byproducts Company 55 East Euclid Avenue Suite 410 Mt. Prospect, Ill 60056-1285
Chris Hall Custom Hay Bailing Services 28003 Sapphire Court Magnolia, TX 77355-3165	Community Bank of Texas c/o Eric Gould Law Office of Eric Gould 5773 Woodway #184 Houston, TX 77057-1501	Community Bank of Texas, NA c/o Eric Gould Law Office of Eric Gould 5773 Woodway #184 Houston, TX 77057-1501
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Southern Bancorp Bank Note 2 Plaza Street Office 425 Plaza Helena-West Helena, AK 72390 Note 72390-2542	Southern Bancorp Bank Note 3 Plaza Street Office 426 Plaza Helena-West Helena, AR 72390-2541	Trans Ova Genetics 2938 380th Street Sioux Center, IA 51250-7514

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End of Label Matrix
 Mailable recipients 38
 Bypassed recipients 8
 Total 46